

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SALVADOR BELTRAN, JR.,  
and ELI GROSS,  
*Individually and on behalf of all others  
similarly situated,*

*Plaintiffs,*

v.

SONY PICTURES ENTERTAINMENT  
INC.,  
d/b/a CRUNCHYROLL

*Defendant.*

**Case No:** 1:22-cv-04858

**Judge:** Sara L. Ellis

**JURY TRIAL REQUESTED**

**PLAINTIFFS' UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs Salvador Beltran, Jr., and Eli Gross (“Plaintiffs”) move this Court for preliminary approval of a class action settlement.

For the reasons set forth in the accompanying documents and filings, Plaintiffs respectfully request, pursuant to FED. R. CIV. P. 23(e)(1), that this Court enter an order:

- 1) Determining that the Court will likely be able to approve the proposed Settlement as fair, reasonable, and adequate pursuant to FED. R. CIV. P. 23(e)(2);
- 2) Determining that the Court will likely be able to certify the Settlement Class as defined in the Settlement, for purposes of judgment on the proposed Settlement pursuant to FED. R. CIV. P. 23(a) and (b)(3);
- 3) Appointing Plaintiffs as Class Representatives of the Class;
- 4) Appointing Plaintiffs’ Counsel as Class Counsel;
- 5) Approving the proposed Notice Plan set forth in the Settlement, including the proposed forms of notice, and directing that notice be disseminated pursuant to the Notice Plan and Fed. R. Civ. P. 23(e)(1);

- 6) Appointing Kroll Settlement Administration LLC as the Settlement Administrator and directing Kroll to carry out the duties and responsibilities of the Settlement Administrator specified in the Settlement;
- 7) Establishing other case related deadlines, including the time for class members to request exclusion from or to object to the Settlement; and
- 8) Scheduling a Final Approval Hearing and certain other dates in connection with the final approval of the Settlement pursuant to Fed. R. Civ. P. 23(e)(2).

Defendant does not oppose this motion. This motion is based on the accompanying memorandum of law, the Settlement and exhibits thereto, and other documents filed in support of the motion.

As explained more fully in those papers, Plaintiffs' respectfully request that this Court preliminarily approve the Settlement.

September 15, 2023

By: /s/ Brandon M. Wise

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\*admitted *pro hac vice*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed with the Clerk of the Court on this date using the CM/ECF e-filing system, which will provide notice and allow access to all counsel of record.

/s/ Brandon M. Wise  
Brandon M. Wise